

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Aisha Pope, #228305

Plaintiff,

v.

Corizon Health, MDOC et al

Defendants,

Case No.: 2:19-cv-10870

District Judge: David M. Lawson

Magistrate Judge: David R. Grand

JOHNSON LAW, PLC
Solomon M. Radner (P73653)
Madeline M. Sinkovich (P82846)
Attorneys for Plaintiff
535 Griswold St., Suite 4632
Detroit, MI 480226
(313) 324-8300
srande@venjohnsonlaw.com
msinkovich@venjohnsonlaw.com

MICHIGAN DEPT. OF ATTORNEY GENERAL
Sara Trudgeon (P82155)
Attorney for MDOC Defendants
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055
trudgeons@michigan.gov

CHAPMAN LAW GROUP
Ronald W. Chapman Sr., M.P.A.,
LL.M. (P37603)
Wedad Suleiman (P81970)
Attorney for Defendants Keith Papendick, M.D.;
Claire Pei, M.D.; Mohammed Azimi, M.D.;
Shanthi Gopal, M.D.; and Donna Rohrs, P.A.
1441 West Long Lake Rd., Suite 310
Troy, MI 48098
(248) 644-6326

rchapman@chapmanlawgroup.com
wsuleiman@chapmanlawgroup.com

JOINT 26(F) REPORT AND DISCOVERY PLAN

On December 7, 2020, the parties conferred via Zoom for the purpose of preparing a joint discovery plan in accordance with Fed. R. Civ. P. 26(f). During this conference, the Parties agreed on the following elements of a joint discovery plan:

- A) The basis for the Court's jurisdiction is pursuant to 28 U.S.C. § 1331 since this action arises under the Constitution and laws of the United States. Jurisdiction is not disputed at this time.
- B) Rule 26(a) disclosures shall be exchanged on December 21, 2020. No changes are necessary in the form or requirement for initial disclosures.
- C) Plaintiff will seek discovery of, but not limited to, Plaintiff's medical records; medical history; and medical file; as well as individual interrogatories, requests for production, and depositions of each defendant and any other relevant matters uncovered through discovery.
- D) MDOC Defendants will seek to depose Plaintiff and request documents, such as medical records, that are relevant to Plaintiff's claims.
- E) Corizon Defendants will seek discovery of Plaintiff's medical records and medical history, including Plaintiff's deposition.
- F) The parties agree that it is not necessary for the Court to order that discovery be conducted in phases or limited to or focused on particular issues. The parties believe that fact discovery can be completed by June 22, 2021 and expert discovery completed by September 20, 2021.
- G) The parties agree that an order under Federal Rule of Evidence 502 is not necessary at this time.
- H) The parties agree that electronically stored information should be preserved.

- I) The parties agree that the standard number of Interrogatories under Rule 33(a)(1) and the standard number and length of depositions permitted under Rule 30 should be permitted in this case. No changes to the limitations on discovery imposed under the Federal Rules are necessary.
- J) The parties' preference for any alternative dispute resolution is a magistrate led settlement conference.
- K) The parties jointly request that the Court enter a Scheduling Order containing the case management deadlines listed in the table below.

EVENT	DEADLINE
Rule 26(a)(1) disclosures	December 21, 2020
Initial Witness list	February 22, 2021
Fact Discovery cutoff	June 22, 2021
Disclosure of Plaintiff's Expert(s)	July 6, 2021
Disclosure of Defendants' Expert(s)	July 20, 2021
Expert Discovery cutoff	September 20, 2021
Dispositive motions due	October 20, 2021
Final pretrial conference	To be set after ruling on dispositive motions
Trial date	To be set after ruling on dispositive motions

Respectfully submitted,

s/Wedad Suleiman

Wedad Suleiman (P81970)

Attorney for Corizon Defendants

s/ Sara Trudgeon (with permission)

Sara Trudgeon (P82155)

Attorney for MDOC Defendants

s/Madeline Sinkovich (with permission)

Madeline Sinkovich (P82846)

Attorney for Plaintiff